

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JOHN DOE, in his capacity)
as the executor of the Estate of)
JANE DOE, in his personal)
capacity, and as the personal)
representative of JANE DOE,) Civil Action No. 01-2516 (RWR)
)
Plaintiff,)
)
vs.)
)
OSAMA BIN LADEN, *et al.*,)
)
Defendants.)
)

)

DECLARATION OF LYNN FAULKNER

1. My name is Lynn Faulkner. I am over the age of 21 years and I have never been convicted of a felony. I am of sound mind and am fully competent to make this declaration. I am the executor of the estate of Wendy Faulkner, and the personal representative of Wendy Faulkner, deceased.

2. I was born on November 3, 1951 in Syracuse, New York and am now 55 years old. I am a United States citizen.

3. At the time of the September 11, 2001 terrorist attack, I was legally married to Wendy Faulkner who was killed as a result of the attack.

4. Wendy was born on July 25, 1954. Wendy was only 47 years old when she was killed. At the time of her death, Wendy was a United States citizen.

5. I met Wendy when she was 16 years old and I was 19 years old. We met at Onondaga Community College in Syracuse, New York where we both were taking classes. After

earning our associate's degrees, we commuted to the State University of New York, Oswego to earn degrees in business administration. Wendy went on to earn her MBA at Syracuse University, while I received my master's at Syracuse University's Newhouse School of Public Communications. Wendy and I were married in 1981 in Syracuse, New York. In 1996, we moved from Syracuse to Cincinnati, Ohio. In the summer of 2001, we were preparing to move to Chicago, Illinois, where Wendy had secured a job.

6. Wendy and I have two daughters, Loren, born on February 8, 1982 in Syracuse, New York, and Ashley, born on July 22, 1988 in Syracuse. Loren was 19 years old and Ashley 13 years old at the time of their mother's death. *See Exhibit A* (family photograph).

7. Wendy was petite and polite and soft spoken, but there was no mistaking her special inner strength and powerful personality. *See Exhibit B* (photograph of Wendy Faulkner).

8. Wendy was an extraordinary woman with an almost inexhaustible ability to care for and help others. When she was 16 years old, she started sending boxes filled with clothing, food, personal grooming items, books, toys, money and other items to orphanages in Third World countries. Wendy continued this kindness in adulthood, sending boxes to orphanages in Africa, the Philippines, Jamaica and Haiti, anywhere where children were living in destitution. For the 31 years I shared life with this amazing woman, a spare bedroom, basement or garage was always a staging area for boxes being prepared to be sent to someone in need. After learning of Wendy's death, one of the families who had received her boxes for years sent me an email, saying that the children would miss "Auntie Wendy's" boxes. For this reason, my daughters and I created a foundation in Wendy's name to continue her work called the Wendy Faulkner Memorial Children's Foundation. *See www.wendyfoundation.org.*

9. Wendy was a wonderful, caring wife and mother. Wendy took care of certain household tasks such as buying the groceries, cooking, and washing the laundry. Since her death on September 11, 2001, I have had to hire someone to complete these tasks, which has cost me an additional \$35,100.00 a year.

10. Wendy was also a very gifted and talented person. Wendy was employed as Vice President and managing director of IT at Aon Risk Services, a risk-management company and insurance brokerage in Chicago, Illinois. Wendy's specialty was integrating computer and data systems of newly acquired business units into the overall Aon information systems structures. She was valued for her world-class technical expertise and very effective people skills.

11. On September 11, 2001, Wendy was attending a one-day business meeting in New York on the 104th floor of the South Tower of the World Trade Center. Wendy was on the 104th floor in the South Tower when the airplane struck the tower. According to a colleague who made it out of the South Tower alive and with whom I later spoke, Wendy did not die instantaneously, as she was seen trying to get on an elevator to get out of the building. The elevator was full, so Wendy could not leave. Wendy likely died when the building collapsed. Wendy never made it out of the building alive.

12. Over the next few days after September 11, 2001, my daughters, Wendy's parents, and I experienced fear, hope and then a crushing loss. On September 16, 2001, we gave up hope that Wendy would be found alive. Her remains have never been recovered.

13. It is hard to put into words what we have been through. It doesn't get any easier. The pain does not go away. With time, we only remember more things about Wendy that miss. Our lives have been irrevocably shattered. My daughters and I have suffered great emotional

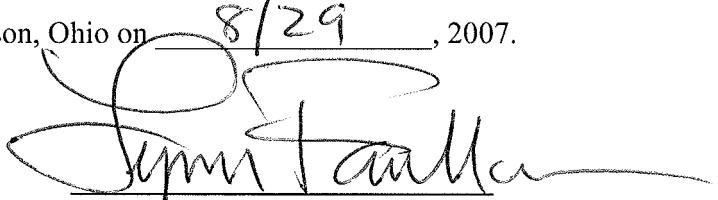
anguish, loss, misery and distress, which has continued to today. We have not been able to fully cope with the loss, particularly because Wendy's death was cruel, violent, agonizing and senseless.

14. The girls had a very special and close relationship with their mother. Wendy was an exceptional and attentive mother. Ashley has never openly cried about Wendy's death. I am concerned for her because she has kept too much inside. My daughters have missed out on the needed guidance they could only get from their mother. Even in the simple things, like when Ashley asks me if her shoes go with her outfit or whether she is wearing too much mascara. I do not have a clue. Without Wendy's guidance, the girls have struggled to define themselves as women and now must overcome lifelong depression growing up without a mother.

15. Wendy was not just my beloved wife, but my best friend. The biggest piece of my future was her. Wendy and I discussed our future together and it was going to be wonderful. We planned to grow old together, travel, and do things we enjoyed together. I do not have much to look forward to now. I have struggled with grief since Wendy's death. The word that keeps coming up is sadness. I thought that I would be angry, but the prevailing feeling I have most of the time is – I just feel sad to the bone. Now all I have is my girls. I want the best for them, but truthfully, I am absolutely terrified of what I will do with myself when they have both left home.

16. Wendy's death also has had a significant effect on my family's finances. Attached to this declaration, as Exhibit C, is a revised version of the report that I submitted to the September 11, 2001 Victims Compensation Fund prepared by John Rapp, Ph.D., Emeritus Professor of Economics at the University of Dayton in Dayton, Ohio, which details my family's economic losses as a result of Wendy's death.

I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true and correct. Executed in Mason, Ohio on 8/29, 2007.



Lynn Faulkner